

Department of Energy

Richland Field Office
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Richland, Washington 99352

9303977



MAY 0 5 1993

93-ERB-144

Mr. George C. Hofer
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Roger F. Stanley, Director Tri-Party Agreement Implementation State of Washington Department of Ecology Post Office Box 47600 Olympia, Washington 98504-7600

Dear Messrs. Hofer and Stanley:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM: REDESIGNATION OF THE 200-ZP-1 AND 200-ZP-2 OPERABLE UNITS (OUS) AND REDEFINITION OF THE 200 WEST AREA GROUNDWATER OUS

Attached for your approval is the subject Class II Change Control Form. The purpose of this change request is to combine the source components of the 200-ZP-1 and 200-ZP-2 OUs and designate this source OU as 200-ZP-2 OU and create a separate, groundwater only OU, designated as 200-ZP-1. Accordingly, waste management units and unplanned release from 200-ZP-1 will be reassigned to 200-ZP-2. The scope of the 200-ZP-1 OU will also collectively address the groundwater beneath the 200-ZP-2, as well as 200-TP-2 and 200-TP-4 OUs. Both 200-TP-2 and 200-TP-4 OUs were originally defined as combination groundwater and source OUs addressing the groundwater beneath the T Plant. The redesignation and reassignment are based on recommendations from the 200 Aggregate Area Management Study Reports.

If you have any questions regarding this change, please contact Mr. P. M. Pak at (509) 376-4798.

Sincerely,

Steven H. Wisness

Hanford Project Manager

ERD: PMP

Attachment

cc w/attach:

B. A. Austin, WHC

C. Cline, Ecology

M. K. Harmon, EM-442

D. R. Einan, EPA

D. D. Teel, Ecology Kennewick Office

WUC Administrative Record

cc w/o attach:

R. A. Carlson, WHC

R. E. Lerch, WHC

J. L. Monhart, EM-442

Federal Facility Agreement and Consent Order Change Number Date Change Control Form C - 93 - 04Do not use blue ink. Type or print using black ink. 3/21/1993 Originator Phone P. M. Pak 6-4798 Class of Change [] [- Signatories [X] II - Project Manager [] III - Unit Manager Change Title REDEFINITION OF THE 200-ZP-1 GROUNDWATER OPERABLE UNIT AND REASSIGNMENT OF ASSOCIATED GROUNDWATER INVESTIGATIONS, WASTE MANAGEMENT UNITS, AND UNPLANNED RELEASES. Description/Justification of Change This change request C-93-04 will implement the recommendations of the 200 West Groundwater Aggregate Area Management Study Report (AAMSR) for the definition of two groundwater operable units in the 200 West Area. The first groundwater operable unit is 200-UP-1, defined in TPA change request M-12-92-1 authorized in June 1992. The second groundwater operable unit will be 200-ZP-1, which will be formally established with approval of TPA change request C-93-04. This change notice will involve the transfer of waste management units (WMUs) and unplanned releases associated with 200-ZP-1 to 200-ZP-2, and transfer of groundwater investigations from the 200-ZP-2. 200-TP-2, and 200-TP-4 to a groundwater only operable unit designated 200-ZP-1. Continued on Page 2. Impact of Change No impact. Affected Documents Hanford Federal Facility Agreement and Consent Order, Volume 2, Appendix C. **Approvals** Approved ___ Disapproved

Date

DOE

EPA

Ecology

Description/ Justification of Change Continued.

The AAMSRs compiled and evaluated the existing body of knowledge to support the *Hanford Site Past-Practices Strategy* (DOE/RL-91-04, March 1992) decision making process. Recommended assessment paths for the WMUs, unplanned releases, and groundwater in the 200 Areas are discussed within the AAMSRs. To maximize the efficiency of the investigation of groundwater flow and contamination, the 200 West Groundwater AAMSR recommended that two groundwater only operable units be defined for the 200 West Area and vicinity.

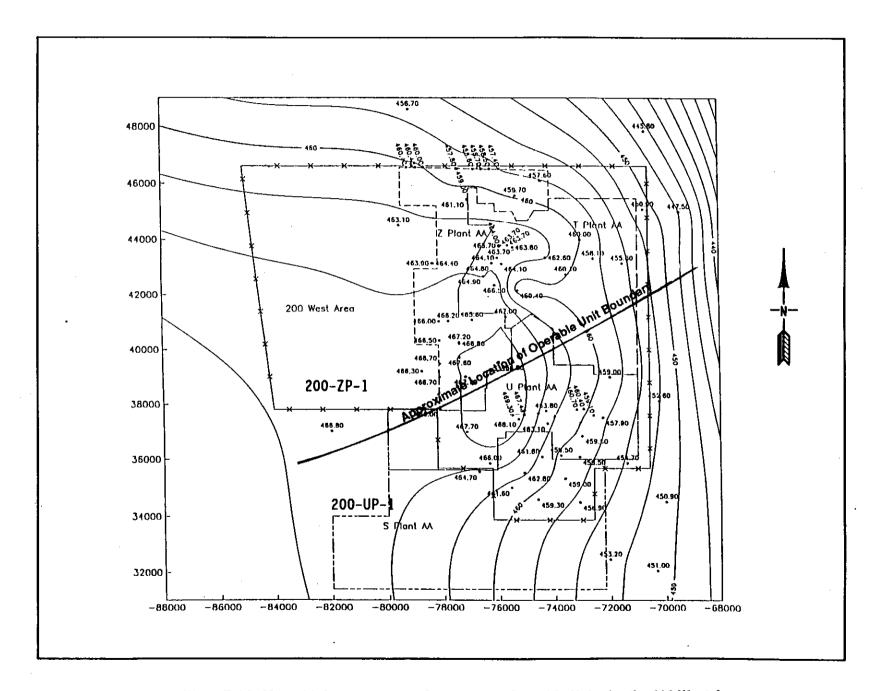
These two groundwater operable units would be divided on the basis of the hydrologic flow system present under the aggregate area. Two parallel hydrologic regimes can be defined, both emanating from the groundwater mound found beneath the location of the former U Pond (216-U-10). Groundwater flow on the north and northeast sides of the mound generally flows north-northeast towards Gable Gap. Groundwater south and east of the mound generally flows east-southeast towards a point south of the 200 East Area. The distributions of the contaminant plumes in the 200 West Groundwater Aggregate Area reflect these flow conditions. Contaminant plumes in the one regime or the other generally do not mix. These two groundwater flow regimes can therefore be the basis of the two groundwater operable units. The line of their division runs approximately along the northern edge of the U Plant Source Aggregate Area (see attached figure), as derived from groundwater potentiometric maps and the extent of the various known plumes.

Because of the interrelations of the contaminant plumes in the 200 West Area, it is considered best to have a relatively small number of groundwater operable units. It is also important, however, to keep the size and complexity of groundwater operable units small enough so that each can handle all groundwater issues in that portion of the 200 West Area. It is believed that these considerations can best be addressed by redefining operable units to create two groundwater operable units.

SPECIFIC CHANGES

Appendix C of the TPA Action Plan:

- 1. All waste management units and unplanned releases listed under 200-ZP-1 shall be moved to 200-ZP-2, and 200-ZP-2 designated as unit category CPP.
- 2. Redesignate the 200-ZP-1 Operable Unit as a groundwater only operable unit which will address the groundwater beneath the 200-ZP-2, 200-TP-2, and 200-TP-4 Operable Units. 200-ZP-1 should be designated as unit category CPP and given a priority of A.



Water Table Map with Recommended Groundwater Operable Units for the 200 West Area

2 2 6 6 1 3 6 7 1 2 6

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author Addressee Correspondence No.

S. H. Wisness, RL P. T. Day, EPA Incoming:
(D. L. Parker, WHC) R. F. Stanley, Ecology Xref:9352409D

Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL

FORM: REDEFINITION OF THE 200-ZP-1 GROUNDWATER OPERABLE UNIT AND REASSIGNMENT OF ASSOCIATED GROUNDWATER INVESTIGATIONS, WASTE

MANAGEMENT UNITS, AND UNPLANNED RELEASES

INTERNAL DISTRIBUTION Approval Date Location w/att Correspondence Control A3-01 M. R. Adams H6-01 L. D. Arnold B2-35 B. A. Austin B2-35 R. A. Carlson H6 - 03G. D. Carpenter H6-20 C. K. DiSibio B3-15 H. D. Downey H6-27 M. Harris (ERC) H6-08 R. E. Lerch B3-63 P. J. Mackey B3-15 H. E. McGuire, Level 1 B3 - 63R. D. Morrison B2-35 D. L. Parker H6-03 J. K. Patterson H6-27 T. M. Wintczak H6-27 C. D. Wittreich H6 - 03R. D. Wojtasek, Assignee H6-27 **EDMC** H6 - 08

Attachments are the same as outgoing letter #9352409D, tmp 6-5813.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

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Addressee

Correspondence No.

S. H. Wisness, RL (D. L. Parker, WHC) G. C. Hofer, EPA

R. F. Stanley, Ecology

H6-08

Incoming: 9303977 Xref:9352409D

Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM: REDEFINITION OF THE 200-ZP-1 AND 200-ZP-2 OPERABLE UNITS (OUS) AND REDEFINITION OF THE 200 WEST AREA GROUNDWATER OUS

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| I.tivfn | EI | T. M. Wintczak | H6-27 | |
| Y 2 7 1993 | - [2] | C. D. Wittreich | H6-03 | |
| ESPONDENCE | F | R. D. Wojtasek, Assignee | H6-27 | |



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